

United States Bankruptcy Court
Middle District of Pennsylvania

In re:
Robert Allen Conte
Debtor

Case No. 22-01353-HWV
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0314-1
Date Rcvd: Aug 10, 2022

User: AutoDocket
Form ID: pdf010

Page 1 of 1
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 12, 2022:

Recip ID	Recipient Name and Address
+	Commonwealth of Pennsylvania, Bureau of Payroll Operations, P O Box 8006, Harrisburg PA 17105-8006

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 12, 2022

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 10, 2022 at the address(es) listed below:

Name	Email Address
Jack N Zaharopoulos (Trustee)	TWecf@pamd13trustee.com
Paul Donald Murphy-Ahles	on behalf of Debtor 1 Robert Allen Conte pmurphy@dplglaw.com kgreene@dplglaw.com
Rebecca Ann Solarz	on behalf of Creditor Rocket Mortgage LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc., bkgroup@kmlawgroup.com
United States Trustee	ustpregion03.ha.ecf@usdoj.gov

TOTAL: 4

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Robert Allen Conte
Debtor 1

Chapter 13

Case No. 1:22-BK-01353-HWV

Matter: Motion for Wage Attachment Order

DEBTOR(S)' MOTION FOR WAGE ATTACHMENT ORDER

AND NOW, come the Debtor(s), Robert Allen Conte, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about July 22, 2022.
- 2) Debtor 1, Robert Allen Conte, receives regular income from employment with **Commonwealth of Pennsylvania**, which may be attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan. Debtor(s) have proposed a Plan under which a portion of future earnings or wages is to be paid to the Standing Chapter 13 Trustee, for the benefit of creditors, in the amount of **\$303.70** from each **bi-weekly** paycheck.
- 3) The likelihood of success in this case will be much greater if Debtor 1's income is attached to fund the Plan, and Debtor 1 consents to the wage attachment.
- 5) Debtor 1's employer should be ordered to deduct from Debtor 1's future earnings or wages the periodic amount proposed by the Plan filed herein, and to pay said amount forthwith to the Standing Chapter 13 Trustee appointed by the Court and continue such periodic deductions and payments until such time as the Plan submitted by Debtor 1 is consummated, or until further order of the Court.

By the Court,



Henry W. Van Eck, Chief Bankruptcy Judge
Dated: August 10, 2022

WHEREFORE, the Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to pay the Standing Chapter 13 Trustee in the amount set forth in the attached Order.

Respectfully submitted,

Date: August 9, 2022

/s/ Robert Allen Conte

Debtor 1

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Robert Allen Conte
Debtor 1

Chapter 13

Case No. 1:22-BK-01353-HWV

Matter: Motion for Wage Attachment Order

ORDER OF COURT

UPON CONSIDERATION of the above-referenced Debtor(s) having filed a Plan under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1, Robert Allen Conte, receives income from:

Commonwealth of Pennsylvania
Bureau of Payroll Operations
PO Box 8006
Harrisburg, PA 17106-8006

Should deduct from said Debtor 1's income the sum of **\$303.70** from each **bi-weekly** paycheck, or such other sums as Debtor 1 may from time to time direct, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which Debtor 1 receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to Debtor 1, and to remit the deductible sums to:

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
PO Box 6008
Memphis, TN 38101-6008

IT IS FURTHER ORDERED that the entity from whom Debtor 1 receives income shall notify the Standing Chapter 13 Trustee if Debtor 1's income is terminated and the reason, therefore. IT IS FURTHER ORDERED that all remaining income of Debtor 1 except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to said Debtor 1 in accordance with usual payment procedure. IT IS FURTHER ORDERED that the employer will place the Bankruptcy Case Number and the name of the Debtor(s) on all checks being forwarded to the Standing Chapter 13 Trustee to ensure proper accounting of the funds.

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Robert Allen Conte
Debtor 1

Chapter 13

Case No. 1:22-BK-01353-HWV

Matter: Motion for Wage Attachment Order

CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, August 9, 2022, I served a true and correct copy of the **Debtor(s)' Motion for Wage Attachment Order and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail
Commonwealth of Pennsylvania
Bureau of Payroll Operations
PO Box 8006
Harrisburg, PA 17106-8006

Via Electronic Means
Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Regan Federal Courthouse
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire